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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Billed Party Preference
for 0+ InterLATA Calls

CC Docket No. 92-77

ORIGINAL
FILE

To: The Commission

**REPLY COMMENTS OF THE
COMPETITIVE TELECOMMUNICATIONS ASSOCIATION**

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The Competitive Telecommunications Association ("CompTel"), by its attorneys, hereby submits these reply comments in response to the Commission's request for information concerning a proposal to implement "billed party preference" for interstate calls dialed on a "0+" basis. CompTel is the principal industry association of the nation's competitive interexchange telecommunications carriers ("IXCs"), with approximately 120 member companies, including large nationwide IXCs as well as scores of smaller, regional carriers. Many of CompTel's members provide operator-assisted calling services either as an adjunct to their direct-dialed interexchange services or as a distinct line of business.

SUMMARY

The Commission has been considering billed party preference for over five years. Yet after five years of

scrutiny, no one has been able to advance a workable or cost-effective system. Certainly the perceived benefits of the Commission's current proposal are far outweighed by the system's substantial drawbacks.

The comments filed herein show that the initial cost of developing and deploying billed party preference likely will exceed \$2 billion. Indeed, this estimate is very rough and probably will continue to increase. Even after this initial investment is made, the system will cost hundreds of millions of dollars annually to administer and operate. These costs will be reflected in substantially increased rates charged for "0+" calls.

In exchange for increased rates, consumers will receive annoying new encumbrances on the way "0+" calls are placed. All "0+" callers will endure increases in call set up times ranging from 6 to 30 seconds per call. Consumers placing collect, person-to-person and billed-to-third number calls -- approximately one half of all "0+" calling -- will need to interact with two operators where only one is needed currently. And numerous important service improvements to "0+" calling, such as voice recognition, voice PINs, voice messaging and credit card billing, will simply be eliminated.

Many IXCs and call aggregators, too, will pay a heavy price for billed party preference. The only practical way for an IXC to participate in the "0+" market in a billed party preference environment is to acquire a nationwide

Feature Group D ("FGD") originating network. The projected expense of such a network is beyond the reach of the vast majority of current providers of operator services. They will be forced from the "0+" market, leaving "0+" competition as the exclusive province of a handful of large nationwide carriers. Similarly, many thousands of aggregators will lose the commission stream upon which they have come to rely in these tough economic times. Indeed, the continued existence of the competitive pay phone industry will be threatened.

Despite these severe shortfalls, billed party preference offers no significant benefits which cannot be achieved under the current system of premises owner presubscription. Thanks largely to recent efforts of Congress and the FCC to establish branding, posting and unblocking requirements, a system of "dialing party preference" already is in place. Callers are made aware of their options. Those who do not wish to use the presubscribed IXC for their "0+" calls may elect to dial a simple and convenient access code to reach their preferred carrier. The initial comments show that billed party preference cannot be deployed until 1996 at the earliest. Callers will become fully accustomed to the present system long before billed party preference could become a reality.

The time has come to abandon this idea once and for all. Billed party preference is a notion that has some superficial appeal. But upon close examination it is clear that any

possible benefits are far outweighed by its detriments. It is not surprising that billed party preference was opposed by over 80 percent of the commenters herein, including most IXC's, several local exchange telephone companies ("LECs") and numerous call aggregators. CompTel strongly urges the Commission to decline to adopt the proposal and concentrate its efforts on the effective implementation of "dialing party preference."

I. BILLED PARTY PREFERENCE IS PROHIBITIVELY EXPENSIVE.

Regional Bell Operating Companies ("RBOCs"), independent LECs and IXC's all must make extraordinary investments to develop and implement a system of billed party preference. The initial comments herein demonstrate that start-up costs are likely to exceed \$2 billion, and operational costs exceeding \$150 million will be incurred annually thereafter. Moreover, these estimates -- which amount at this stage simply to "best guesses" -- are bound to increase significantly as billed party preference is defined more fully and as development progresses.

A. LEC Development and Implementation Expenses Are Enormous.

As requested by the Commission, the RBOCs provided estimates of the cost of billed party preference in their initial comments. The results are staggering. Bell Atlantic, the chief proponent of billed party preference,

estimates that its implementation costs for the first year of billed party preference will be \$134 million.¹ The other RBOCs and GTE provided similar estimates: BellSouth placed its cost at \$153 million;² US West at \$149 million;³ The Pacific Companies at \$142 million;⁴ Southwestern Bell at \$127 million;⁵ NYNEX at \$96 million;⁶ Ameritech at \$81 million;⁷ and, finally, GTE estimated \$107 million.⁸ Collectively, billed party preference would cost the seven RBOCs and GTE \$964 million to develop and deploy.

Three of those RBOCs also estimated the per call impact of a billed party preference system. They figured that, on average, billed party preference would add at least \$0.14 to the cost of every "0+" call.⁹ Moreover, since at most 40

¹ Bell Atlantic Comments at Attachment A. Further, Bell Atlantic estimates that preservation of the 10XXX access code option in a billed party preference environment will cost \$50 million. Id. at 3.

² BellSouth Comments at Exhibit 1.

³ US West Comments at 6.

⁴ Pacific Bell Comments at 22.

⁵ Southwestern Bell Comments at 10.

⁶ NYNEX Comments at 4-5.

⁷ Ameritech Comments at 16.

⁸ GTE Comments at 11.

⁹ Ameritech Comments at 16 (estimating a per call cost of \$0.16); BellSouth Comments at 12 (estimating a per call cost of \$0.11); NYNEX Comments at 17 (estimating a per call cost of \$0.14). In its initial comments, CompTel estimated a somewhat higher per call cost. The discrepancy
(continued...)

percent of callers could receive any benefit from billed party preference,¹⁰ the real cost of billed party preference is much higher. If only those calls upon which it might have any effect are considered, the real cost of billed party preference would be approximately \$0.35 per call in RBOC and GTE territories.

Not surprisingly, several RBOCs concluded that the perceived benefit of billed party preference could not justify these exorbitant expenses. For example, BellSouth, a former supporter of billed party preference, concludes that in part due to the "significant curative" provided by TOCSIA and recent FCC actions, the costs of billed party preference substantially outweigh its benefits.¹¹ Similarly, NYNEX cites the "significant costs of billed party preference" which translate into "higher costs to the consumers" in its opposition to billed party preference.¹² Perhaps US West summarized it best when it concluded, "[b]illed party preference will result in the needless expenditure of huge

⁹(...continued)
is explained by the fact that these RBOCs have used much higher "0+" demand figures than have previously been available. If these new RBOC figures are incorrect, the per call cost could increase dramatically.

¹⁰ See CompTel Comments at 12-13.

¹¹ BellSouth Comments at 5, 19-20.

¹² NYNEX Comments at 15-16.

sums while at the same time exacerbating what confusion end users may experience today."¹³

Moreover, in order to achieve universality of the system, substantially all of the 1,400 independent LECs across the nation must convert their "0+" systems to billed party preference as well. These independent LECs would have to make the same investments as would the RBOCs: new trunks, upgrades at the end offices, additional operators, and complex software changes. Many independent LECs also would need to deploy Signaling System #7 ("SS#7") and Automated Alternate Billing Services ("AABS") throughout their networks, and either establish their own LIDB or make arrangements to share LIDB facilities with other LECs, as a prerequisite to conversion to billed party preference.¹⁴ These expenses could raise the independent LECs' costs well above the RBOCs' estimates, which generally exclude their own SS#7 costs because they have accounted for these expenditures elsewhere.¹⁵

Southern New England Telephone Company, for example, estimates its cost to implement billed party preference at

¹³ US West Comments at 3.

¹⁴ See Consolidated Communications Operator Services Joint Comments at 5.

¹⁵ SNET Comments at 4.

over \$30 million.¹⁶ According to OPASTCO, a trade association representing smaller independent LECs, billed party preference conversion could cost as much as \$600,000 per end office for some independent LECs, depending upon the extent of their deployment of technologies such as SS#7.¹⁷ Similarly, Illinois Consolidated Telephone Company estimated its conversion costs at over \$878,000.¹⁸

Thus, the initial cost experienced by all LECs collectively could easily exceed \$2 billion.¹⁹ This expense is prohibitive. Even if the recovery of these implementation costs is spread over a period of years, the expense of billed party preference will inevitably drive up substantially the rates consumers must pay for interstate "0+" calls. For example, if estimated implementation costs of \$2 billion are amortized over seven years, the LECs would need to recoup over \$285 million per year to recover their initial

¹⁶ SNET Comments at 3-4. Notably, SNET's estimate also excludes the costs of additional operators and operator-related expenditures which will accompany billed party preference. Id. at 2.

¹⁷ OPASTCO Comments at 4 n.2. These problems make it easy to understand why OPASTCO concluded that "conversion to the new equal access plan of billed party preference could prove to be an insurmountable investment for many local exchange companies." Id. at 2.

¹⁸ Consolidated Communications Operator Services, Joint Comments at 4, 5.

¹⁹ If each independent LEC were required to invest the same amount as Illinois Consolidated Telephone Company (i.e. \$878,000), the total cost to independent LECs to deploy billed party preference would exceed \$1.2 billion.

investment. Based upon current RBOC estimates, an additional \$150 million annually would be needed to cover recurring costs for maintenance and administration of the system.²⁰ The result is an additional \$435 million per year that must be recovered from interstate "0+" revenues. Rates to consumers surely will be impacted.

Indeed, even these dire figures may substantially understate the actual impact, since the estimates provided by the RBOCs and GTE, understandably, are inexact. As the Pacific Companies observed:

[E]stimating costs for deployment of a system not yet developed is speculative. Vendor costs are unknown and it is very difficult to even get vendors to suggest a price Nonetheless, [these comments] will try to illustrate . . . our best guess as to the costs that will be involved.²¹

The "soft" nature of vendor prices also was a concern for other RBOCs. Southwestern Bell, for example, expressed its consternation with the sudden increase in its vendors' price quotes, from \$75 million to \$127 million within the two weeks

²⁰ See Ameritech Comments at 16 (\$29.3 million); Bell Atlantic Comments at Attachment A (\$8.6 million); BellSouth Comments at 12 (\$6.8 million); GTE Comments at 11 (\$23.0 million); NYNEX Comments at 5 (\$13.7 million); Pacific Bell Comments at 22 (\$26 million). US West and Southwestern Bell did not estimate their annual recurring expenses attributable to billed party preference. Assuming their expenses equal the average of the other RBOCs, the total administration and maintenance costs of billed party preference for the RBOCs and GTE alone would be \$143.2 million per year after initial implementation. The expenses of other independent LECs would further inflate the number, certainly to over \$150 million annually.

²¹ Pacific Bell Comments at 19.

prior to filing its comments.²² The RBOC cautioned that although its estimate incorporated current information, it "cannot at this time predict the costs for [billed party preference]."²³

CompTel believes that Bell Atlantic is correct when it warns that "the actual cost [of billed party preference] could be significantly different [from current estimates]."²⁴ Indeed, all indications are that the cost will be significantly higher than the already prohibitive numbers being estimated now. As recently as November of last year, Bell Atlantic proclaimed that all seven RBOCs and GTE combined could implement billed party preference for \$150 million.²⁵ Now, Bell Atlantic's own costs will approach that figure, and the total of RBOC and GTE estimates already exceeds Bell Atlantic's earlier estimate six times over. Southwestern Bell's experience stands as a harbinger of additional large increases in the cost of billed party preference.

The enormous expenditure required to develop and deploy billed party preference already greatly exceeds the amount previously anticipated by its principal advocates and the

²² Southwestern Bell Comments at 10.

²³ Id.

²⁴ Bell Atlantic Comments at Attachment A.

²⁵ Bell Atlantic Supp. Comments at 2 (November 22, 1991); see NPRM at ¶ 25.

Commission. CompTel believes strongly that the substantial projected cost of billed party preference far outweighs its meager benefit.

B. IXCs Also Would Have to Invest Large Sums to Implement Billed Party Preference.

Billed party preference would require substantial modifications of IXC networks as well. These modifications would include new trunking facilities connecting the IXC with the LECs' Operator Service Switch ("OSS"),²⁶ modification or rerouting of trunking facilities to the LEC tandem switch,²⁷ conversion to SS#7, the addition of new signalling software,²⁸ and other changes to the IXCs' call processing software.²⁹ In addition, many IXCs would have to reissue their calling cards in the 891 or CIID format.³⁰

The cost of these modifications cannot fully be assessed until the scope of billed party preference is more clearly defined. Nevertheless, AT&T has estimated that its costs alone will be at least \$68 million.³¹ In addition, AMNEX

²⁶ AMNEX (NYCOM) Comments at 16-17; AT&T Comments at 13-14.

²⁷ AMNEX Comments at 17.

²⁸ AT&T Comments at 14.

²⁹ Id. at 12-13.

³⁰ AMNEX Comments at 9-10; CNS Comments at 7.

³¹ AT&T Comments at 12-14.

estimated that billed party preference will increase its network costs by 50 percent.³² It is safe to conclude that, whatever the final cost turns out to be, it will be substantial and ultimately will result in higher rates being charged to consumers. This result is clearly contrary to the public interest, to the Commission's recent policies toward operator services, and to the IXCs' desire to provide an attractive product for end users.

**II. BY THE TIME THAT BILLED PARTY PREFERENCE
CAN BE IMPLEMENTED, CONSUMERS WILL BE
FULLY ACCUSTOMED TO ACCESS CODE DIALING.**

The Commission must realize that billed party preference cannot be deployed in the near term. US West ventured its "most optimistic" prediction and still concluded that billed party preference could not be deployed for 3-4 years after FCC action.³³ Bell Atlantic and GTE confirmed that the system could not be deployed until 1996 "at the earliest."³⁴ Thus, for the next several years, presubscription will determine the routing of "0+" calls.

During this time, of course, all access codes will become fully unblocked, and consumers who prefer a particular carrier will reach that carrier by dialing its access code.

³² AMNEX Comments at 16-17.

³³ US West Comments at 10-11 (estimating that implementation will take 39 to 45 months).

³⁴ Bell Atlantic Comments at 2; see also GTE Comments at 8 (deployment will take four years after FCC action).

Considerable market evidence exists which shows that consumers, aided by IXC-sponsored education efforts, quickly adapt to access code dialing.³⁵ By the time billed party preference could be activated in 1996 (or after) consumers will have learned how to determine the presubscribed carrier at individual locations and those who decide not to use the presubscribed carrier can "automatically" access their preferred carrier through the use of an access code. Thus, the two benefits that billed party preference promises -- ease of dialing and the ability to select a preferred IXC -- will be realized long before billed party preference is deployed.

III. BILLED PARTY PREFERENCE WOULD SERIOUSLY DEGRADE OPERATOR CALL PROCESSING.

After spending billions of dollars and over four years implementing billed party preference, callers would be left with a system which will frustrate and confuse them. In its Notice herein, the Commission acknowledged concerns that billed party preference might significantly increase access times and require callers to provide certain information about their call to both the LEC and IXC.³⁶ At the

³⁵ For example, one private payphone owner reported previously that the use of "10288" access code dialing increased from 12.88 percent of call attempts to 23.07 percent of call attempts between October 1990 and April 1991. APCC Reply Comments, CC Docket 91-35, Exh. 2 (filed April 26, 1991).

³⁶ Notice at ¶¶ 26-27.

Commission's invitation, CompTel explained in its initial comments herein how billed party preference will make "0+" dialing less convenient and more time-consuming for callers than the current system.³⁷

CompTel's comments necessarily were rather general on these points because no party other than the LECs and AT&T have had access to detailed information about how billed party preference, AABS and OSS Signaling System #7 ("OSS#7") would actually work. Indeed, few technical details or network schematics describing how a billed party preference system would be configured have ever been made public.³⁸ With so little information on the proposal, it is difficult to comment precisely, especially since as many as 144 different methods have been suggested for defining and implementing billed party preference.³⁹

Incredibly, the proponents of billed party preference provided scant new information in their initial comments concerning how these systems would work. Neither Bell Atlantic nor Ameritech, the principal advocates of billed party preference, used this opportunity to provide technical information or drawings which describe how the proposed system would be configured and operate.⁴⁰ One can only

³⁷ See CompTel Comments at 11-21.

³⁸ AMNEX Comments at 2; ClearTel Joint Comments at 3.

³⁹ Southwestern Bell Comments at 4.

⁴⁰ See Bell Atlantic Comments; Ameritech Comments.

surmise that these proponents of billed party preference have not yet figured out a workable system, which may explain the huge development costs included in all of the RBOC cost estimates. This view is supported by the comments of BellSouth which explained that "[t]echnical specifications for OSS7, the AABS upgrade and EAABS have not been finalized, with the result that vendor development of necessary hardware and software has not yet begun."⁴¹

Nevertheless, the commenters clearly established that current plans for billed party preference would seriously degrade the current state of operator call handling.

**A. Under Billed Party Preference
Many, If Not Most, Callers Will
Have to Deal With Two Operators.**

The most serious problems with billed party preference arise with respect to so-called "0+-" dialed calls such as collect calls, bill-to-third number calls and person-to-person calls. For each of these call types, callers would have to provide information to both the LEC and the IXC in order to complete a call under a system of billed party preference.

As US West explained succinctly, if billed party preference were required today, "a caller would have to provide verbally the same information twice (i.e., the calling telephone number, the called telephone number, the

⁴¹ BellSouth Comments at 11.

telephone number to be billed). For collect, bill-to-third number and person-to-person calls, the caller would have to provide additional information to the IXC operator. In addition, for calling card calls, the caller would have to enter his or her account number once for the originating LEC and again for the chosen IXC."⁴²

The Commission acknowledged these problems in the Notice, but expressed a hope that OSS#7 and AABS would provide technical solutions which would enable LECs to automatically collect and send all necessary call information to the billed party's preselected IXC. However, contrary to the apparent understanding of the Commission, OSS#7 simply does not exist today. The SS#7 functionality required for transport between OSSs has not yet been developed, and will not be available until late 1994 or early 1995.⁴³ Similarly, the AABS system in place today is designed exclusively for LEC applications, and the current version of AABS "will need to undergo significant modifications to operate in the BPP environment."⁴⁴ There is no assurance that these systems can be developed, or, if they can, that they can be deployed at a reasonable cost and on the schedule envisioned.

Moreover, the commenters demonstrate convincingly that even these proposed technologies do not eliminate the double

⁴² US West Comments at 7 (emphasis in original).

⁴³ Id. at 8.

⁴⁴ Ameritech Comments at 14.

operator problems experienced in the placement of "0+-" calls under a billed party preference system. The proposed enhanced AABS system would merely replace the front-end LEC operator with a robotic operator. The AABS system would prompt the caller to enter digits identifying a call type, the called number and necessary account information. The proposed OSS#7 system would then transport the numeric information collected by AABS from the LEC OSS to the IXC POP.

While this proposed system, if developed and implemented successfully, would eliminate the need for two operators on "0++" dialed calling card calls, it would not alleviate the need to deal with two operators for "0+-" dialed calls. The simple reason is that AABS cannot and will not record and transmit any information which is provided by callers verbally. The caller's name must be provided verbally on collect calls. The names of both the caller and called party are required to complete person-to-person calls.⁴⁵ And, verbal clearance is usually required from the billed party to complete a bill-to-third number call. For each of these call types, callers will be required to provide information to two separate operators, "once to the LEC operator and a second time to the IXC operator."⁴⁶

⁴⁵ Indeed, person-to-person calls are not even included within current AABS procedures or system design. US West Comments at 8 n.15; Pacific Bell Comments at 18.

⁴⁶ US West Comments at 8.

Several proponents of billed party preference imply that this double operator involvement is acceptable because the LEC AABS operator will be robotic and callers will not be required to give the exact same information to both operators.⁴⁷ But, as BellSouth explains, "in a BPP system the customer is still required to interact with two distinct operator service systems; this fact is not changed by automating the operator function of one or both IXCs. The transfer from LEC to IXC system cannot be made transparent and ... would prove confusing to the public."⁴⁸

The problem is exacerbated by the fact that callers, not surprisingly, can and do elect to bypass the AABS system entirely to reach a live operator. This happens, for instance, when callers are confused, unaware of their options or simply prefer dealing with humans over machines. On these occasions callers would have to provide call information verbally both to the live LEC operator and subsequently to the IXC operator.⁴⁹

It is critical to realize that these are not rare or isolated circumstances. The call types which would entail double operator processing under billed party preference represent a large proportion of all operator services

⁴⁷ See Ameritech Comments at 13; Bell Atlantic Comments at 8.

⁴⁸ BellSouth Comments at 14.

⁴⁹ Id.

calling. AMNEX, for example, reports that 42 percent of its originating traffic would be affected.⁵⁰ ClearTel, ComSystems, International Pacific and Teltrust state that between 48 percent and 66 percent of their traffic falls into this category.⁵¹ While the exact percentage may vary from carrier to carrier, it is clear that the impact is very substantial. CompTel has little doubt that the affected callers will become both confused and angered by the necessity of dealing with two operator systems on such occasions.

B. Billed Party Preference Would Substantially Increase Access Times for Placing "0+" Calls.

All "0+" calls would take significantly longer to process under billed party preference than they do today. Both the interposition of the LEC operator system and the transfer of the information collected to the preselected IXC add significant access time to the call processing sequence.

At least three separate elements of the billed party preference operating system contribute to delay in the processing of "0+" calls. First, the caller is confronted with an AABS menu from which he or she must select a call type. This functionality adds from two seconds (for a LEC calling card) to 20 seconds (for a bill-to-third number call)

⁵⁰ AMNEX Comments at 19.

⁵¹ ClearTel Joint Comments at 17.

depending upon the call type and the caller's familiarity with AABS.⁵² Second, a LIDB query must be launched to ascertain the billed party's preferred carrier. Such LIDB queries can take up to five seconds before timing out.⁵³ Finally, according to US West, the OSS#7 transfer of information from the LEC OSS to the IXC OSS adds an additional two to five seconds.⁵⁴ US West estimates that these elements combined add 6-30 seconds to the processing of "0+" calls under billed party preference as compared to the present system.⁵⁵ Similarly, Bell Atlantic, a principal proponent of billed party preference, estimates that the average processing time for AABS under billed party preference would be 22 seconds.⁵⁶

The initial comments herein make clear that the Commission was incorrect in assuming that "callers would be receiving instructions from the LEC during the call set-up period, which would reduce the incidence of call abandonment."⁵⁷ The fact is that under current plans for billed party preference customer instructions will be given before call processing begins and will not overlap with call

⁵² US West Comments at 13.

⁵³ Id.

⁵⁴ Id.

⁵⁵ Id.

⁵⁶ Bell Atlantic Comments at Attachment A, p.3.

⁵⁷ Notice at ¶ 27.

processing.⁵⁸ Moreover, while the LEC operator is accessible to a caller during the database query, no contact is possible during transfer to the IXC and call set-up, thereby increasing the chances of call abandonment.⁵⁹

The Commission also is mistaken in assuming that the additional time required for billed party preference call processing would be largely offset by the fact that callers would save time by not dialing carrier access codes.⁶⁰ For the large majority of operator service calls which already are placed on a "0+" basis the 6-30 second increase in access time is entirely incremental to the current system. Even where access codes are used, estimates US West, callers use only 2.5 to 5.5 seconds per call dialing them⁶¹ -- far less than the additional time required to process calls under billed party preference.

The initial comments filed herein make clear that "0+" call processing times will increase substantially under billed party preference. Indeed, the delay caused by billed party preference significantly exceeds the five second pause which the Commission recently found to be unacceptable for

⁵⁸ US West Comments at 13.

⁵⁹ BellSouth Comments at 15-16.

⁶⁰ Notice at ¶ 27.

⁶¹ Assuming .5 second per keystroke using a touchtone keypad, US West estimates that it takes 2.5 seconds to dial a 10XXX access code, 3.5 seconds to place a 950-10XX call and 5.5 seconds to dial 1-800-NXX-XXXX. US West Comments at 12-13.

800 calls.⁶² CompTel believes strongly that this additional call set-up time will translate into consumer annoyance and increased call abandonment.

**C. Technical Limitations Inherent
in Billed Party Preference Will
Eliminate Many Present and Future
Enhancements to "0+" Call Processing.**

The technical degradation attendant to the proposed billed party preference system is not limited to added complexity and increased set up times. Billed party preference would actually eliminate several important new "0+" service offerings and features, and preclude the future development of such improvements. This both inconveniences consumers who have come to rely on these improvements and reduces "0+" competition by making it more difficult for IXCs to compete for business based upon the development of attractive service features.⁶³

The problem is caused by the interposition of the LEC OSS and AABS system between the IXC and its customers. IXCs will be able to receive only the numeric information collected by the LEC; no additional numeric information can be collected on the "front end" of the call, and voice applications are entirely precluded.⁶⁴ As a consequence, the

⁶² See Provision of Access for 800 Service, 4 FCC Rcd 2824, 2829 (1992).

⁶³ See AT&T Comments at 15.

⁶⁴ Id.